***** CONFIDENTIAL *****
***** PREDECISIONAL DOCUMENT *****

5075

SUMMARY SCORESHEET
FOR COMPUTING PROJECTED HRS SCORE

SITE NAME:	**D & M STEEL**		
CITY:	**PACOIMA**	**COUNTY:**	**LOS ANGELES**
EPA ID #:	**CAO001368182**	**EVALUATOR:**	**LORI PARNASS**
PROGRAM ACCOUNT #:	**V-999-252-01-0**	**DATE:**	**11/1/99**
LAT/LONG:	**34 16' 15.9"/118 25' 30.2"**	**T/R/S:**	**2N. 15W**
THIS SCORESHEET IS FOR A	**PA:**	**SI:**	
	OTHER: PEA/SI		

RCRA STATUS (check all that apply):

	Generator
	Small Quantity Generator
	Transporter
	TSDF
X	Not Listed in RCRA Database as of (Date of Printout)

STATE SUPERFUND STATUS:

	DTSC Annual Work Plan (formerly BEP) (Date)
	WQARF (Date):
X	No State Superfund
	Status (Date): 11/1/99

	S Pathway	S u2 Pathway
Groundwater Migration Pathway Score (Sgw)	84.77	7185.96
Surface Water Migration Pathway Score (Ssw)	*	*
Soil Exposure Pathway Score (Ss)	*	*
Air Migration Pathway Score (Sa)	*	*
(S gw 2 + S sw 2 + S se 2 + S am 2)		7185.96
(S gw 2 + S sw 2 + S se 2 + S am 2)/ 4		1796.90
Square Root of (S gw 2 + S sw 2 + S se 2 + S am 2)/ 4		42.39

* Pathway evaluated, but not assigned a score (explain):

* Surface Water - Rainwater runs into storm drains and then into the Los Angeles River. There are no drinking water intakes along this path.
* Soil Exposure - The site is in an industrial area and is completely paved and fenced. There are no daycares within 200 feet of the site.
* Air Migration - The site is in an industrial area and is completely paved and fenced. There are no daycares within 200 feet.

GROUNDWATER MIGRATION PATHWAY SCORESHEET

	Maximum Value	Score	Rationale	Data Quality
Likelihood of Release				
1 Observed Release	550	0	1	
2 Potential to Release				
2a. Containment	10	10	2	H
2b. Net Precipitation Value	10	3	3	H
2c. Depth to Aquifer Value	5	3	4	E
2d. Travel Time	35	35	5	E
2e. Potential to Release [lines 2a x (2b+2c+2d)]	500	410		
3 Likelihood of Release (line 1 or 2e)	550	410		
Waste Characteristics				
4 Toxicity/Mobility	(a)	100	6	H
5 Hazardous Waste Quantity	(a)	10	7	D
6 Waste Characteristics (lines 4 x 5, then use Table 2-7)	100	6		
Targets				
7 Nearest Well Value	50	5	8	H
8 Population				
8a. Level I Concentrations	(b,c)	0	9	E
8b. Level II Concentrations	(b,c)	0	9	E
8c. Potential Contamination	(b,c)	2,833	9	E
8d. Population (lines 8a+8b+8c)	(b)	2,833		
9 Resources	5	5	10	E
10 Wellhead Protection Area	20	0	11	H
11 Targets (lines 7+8d+9+10)	(b)	2,843		
Aquifer Score				
12 Aquifer Score [(lines 3 x 6 x 11)/82500, Subject to a Maximum of 100]	100	84.77		
GROUNDWATER MIGRATION PATHWAY SCORE				
13 Pathway Score (Sgw) (Highest score from line 12 for all aquifers evaluated, subject to a maximum of 100)	100	84.77		

(a) Maximum value applies to waste characteristics category.

(b) Maximum value not applicable.

(c) Value computed on attached calculation sheet.

AQUIFER EVALUATED: San Fernando Valley

GROUNDWATER PATHWAY CALCULATIONS FOR POPULATION

ACTUAL CONTAMINATION

Well Identifier	Contaminant Detected	Contaminant Concentration (Note Units)	Benchmark (Note Units)	Apportioned Level Multiplier* (A)	Apportioned Population Well Serves (B)	Actual Contamination Factor (A x B)
					0	0
					0	0
					0	0
					0	0
					0	0
					0	0
				SUM LEVEL I CONCENTRATIONS		0
				SUM LEVEL II CONCENTRATIONS		0

*** Level Multipliers:**

Level I = 10.

Level II = 1.

POTENTIAL CONTAMINATION

Distance Ring (Miles)	Number of Wells Within Distance Ring	Population Served by Wells Within Distance Ring	Distance Weighted on Values (Table 3-12)
0.00 to 0.25	0	0	0
>0.25 to 0.50	0	0	0
>0.50 to 1.00	0	0	0
>1.00 to 2.00	3	20,350	2,939
>2.00 to 3.00	16	111,700	21,222
>3.00 to 4.00	5	74,000	4,171
			28,332
		POTENTIAL CONTAMINATION: SUM/10	2,833.2

AQUIFER EVALUATED San Fernando Valley

HRS Rationale:

D & M Steel
11035 Sutter Avenue
Pacoima, CA 91333
CAO 001368182

Groundwater Migration Pathway:

Likelihood of Release:
1) Potential Release

A observed release was not projected because groundwater samples taken from both up gradient and down gradient wells contain similar levels of VOCs.

Source:
California Department of Toxic Substances Control Preliminary Endangerment Assessment/ Site Investigation, conducted June and July, 1997. D & M Steel *Preliminary Endangerment Assessment/Site Investigation Report,* May 1998.

2) Containment

A factor of 10 was assigned because waste was disposed to brick-lined waste vault on-site. The adequacy of the brick as a liner for solvents is questionable. Also, tetrachloroethene (PCE) and 1,1,1-trichloroethane (TCA) were detected in soil samples collected by PRP's contractor near the vault so there is evidence of hazardous substance migration.

3) Net Precipitation Value

A factor of 3 was assigned based on Figure 3-2 of the HRS.

4) Depth to Aquifer Value

A factor of 5 was assigned because TCA was previously detected at 60 feet bgs and the depth to groundwater is approximately 65 feet bgs.

5) Travel Time

A factor of 35 was assigned because the depth to aquifer is less than 10 feet below lowest level of contamination.

Waste Characteristics:

6) Toxicity/Mobility

Hazardous Substance:	Toxicity:	Mobility:	TxM Value:
Tetrachloroethene (PCE)	100	1	100 *

* = Hazardous Substances with the highest TxM Value

Source:
California Department of Toxic Substances Control Preliminary Endangerment Assessment/ Site Investigation, conducted June and July, 1997. D & M Steel *Preliminary Endangerment Assessment/Site Investigation Report,* May 1998.

7) Hazardous Waste Quantity

Using Tier D - Area, Contaminated Soil: L x W / 34,000
The dimensions of the contamination soil are not known but estimated to be 50 X 100 ft below the site and under the vaulted disposal area.
50 X 100 = 5,000; 5,000 / 34,000 = 0.147; 0.147 = 0-100 = 1 = Default to 10

Source:
California Department of Toxic Substances Control Preliminary Endangerment Assessment/ Site Investigation, conducted June and July, 1997. D & M Steel *Preliminary Endangerment Assessment/Site Investigation Report,* May 1998.

Targets:
8) Nearest Well Value

The nearest drinking water wells are 1 to 2 miles away.

Source:
GIS provided by USEPA. Melvin Blevins, Watermaster for the Upper Los Angeles River Area. Tony Salazar, City of San Fernando Public Works

9) Population

The City of Los Angeles (LADWP) provides 3.7 million people water from three well fields: Mission (@1-2 miles), Tujunga (@2-3 miles), and Rinaldi- Toluca (@3-4 miles). The LADWP is a blended system that imports approximately 85-87% of its total water. Since imported water accounts for more than 40% of the total water supply, the population is apportioned to each well or group of wells within a given distance ring based on production. Within a given distance ring, the number of wells in each well field, total production for that well field system, and the corresponding population served are summarized in the table below.

The City of San Fernando provides water to a population of approximately 24,000 people. About 75% of the water comes from four groundwater wells in the Sylmar Basin and 25% is imported.

Since no single source is greater than 40%, the population is apportioned equally among the four wells and surface water source.

Estimated Population Served from Wells within 4 Mile Radius:

Distance	No. Of Wells	Source	Production Rate	Population Calculation	Population Served
0-1 Mile	0	N/A	N/A	N/A	N/A
1-2 Miles	3	Mission Wells (LADWP)	3,300 acre ft/year	3.7 million * 3,300 / 600,000 acre ft/year	20,350
2-3 Miles	16	12 Tujunga Wells (LADWP) 4 City of San Fernando Wells	15,000 acre ft/year 75% groundwater 25% imported	3.7 million * 15,000 / 600,000 acre ft/year 24,000 / 5 sources * 4 wells	111,700
3-4 Miles	5	5 of 15 Rinaldi-Toluca Wells (LADWP)	1/3 of 36,000 acre ft/year	3.7 million * 12,000 / 600,000 acre ft/year	74,000

Since an observed release is not projected, actual contamination is not projected. However, DTSC notes that the DWP has taken one Toluca well field well out of commission because PCE contamination above the MCL has been detected.

Source:
Watermaster Service in the Upper Los Angeles River Area, Los Angeles County.
Richard Nagel, Assistant to the Watermaster, LADWP.
Tony Salazar, City of San Fernando, Public Works.

10) Resources

There are numerous recreational facilities and parks located within a few miles of the site.

Source:
Thomas Guide map and Site Visit

11) Wellhead Protection Area

There are no wellhead protection areas in California.

Annotated NPL Prioritization Criteria Memo

*** CONFIDENTIAL PREDECISIONAL DOCUMENT***

NPL PRIORITIZATION CRITERIA MEMO

Submitted To: Rachel Loftin

Thru: Greg Holmes

Prepared By: Department of Toxic Substances Control

Date: May 30, 1998

Site: D & M Steel

Site EPA ID Number: CAO 001368182

Review and Concurrence:

The Contractor evaluated each of the following criteria to assist the U.S. Environmental Protection Agency (EPA) in determining if this site is appropriate for NPL consideration.

STATE AGENCY PRESENT AND FUTURE INVOLVEMENT

NONE

OTHER REGULATORY INVOLVEMENT

NONE

SITE OWNER/OPERATOR INVOLVEMENT

UNKNOWN

COMMUNITY RELATIONS/INVOLVEMENT

NO

RELATION TO OTHER SITES

The D & M Steel site is a subset of another site being investigated by the EPA, or part of a proposed or listed NPL site.

OUTSTANDING HRS ISSUES

There do not appear to be any outstanding HRS issues. The site scores 42.39 based on the groundwater migration pathway only. There are trace levels of PCE in onsite soil at 6 inches below ground surface and PCE concentrations above the MCLs at the onsite groundwater monitoring wells, as well as, potential contamination of 27 municipal wells that are within 4 miles of the site, downgradient, and part of a blended drinking water system that serves approximately 540,000 people. The next appropriate step may be an Expanded Site Inspection (ESI).

The following additional documentation would assist the EPA in determining the degree to which a potential to release from the site to groundwater exists. Onsite soils have been sampled to a maximum depth of .5 feet bgs during this investigation, with PCE being reported at trace concentrations. The top of the uppermost aquifer occurs at a depth of approximately 80 feet bgs beneath the site. A future soil sampling event that includes collecting samples at several intervals below 10 feet bgs would indicate the vertical extent of PCE migration in the vadose zone.

CAL/EPA-DTSC Response to Comments for D & M Steel PEA/SI

1.0 PACKAGE COMPLETENESS - This report was submitted as a Preliminary Endangerment Assessment intended to provide USEPA with equivalent information to an SI. All SI equivalent components have been included in this report. The contact reports are adequate. No site reconnaissance report was written, this is stated in Section 1.0-Introduction. The EPA ID number, while unusual, is not incorrect, it is the number provided in the May 1996 CERCLIS listing.

2.0 HRS SCORESHEET - Revised to reflect the most current information provided DTSC by E & E. DTSC notes that the original score of 43.91 has been revised to 42.4 and believes the variation in numbers may lie with differing approaches to scoring.

3.0 PEA/SI REPORT - DTSC understands there are differences between the PEA and the SI and has attempted to bridge the gap with this report.

3.1 General Comments - Revised to reflect comment.

3.2 Report Introduction - The CERCLIS information can be found in Section 2.1- Site Identification Information.

3.3 Site Description - The determination that map quality is poor is subjective. Maps are adequate. The size of the site is listed in Section 2.1- Site Identification Information. The description of the sites hazardous substances are described in Section 3.2-Hazardous Substance/Waste Management Information.

3.4 Investigative Efforts - Figure 3 has been enhanced to reflect sampling locations.

3.5.1 Sources of Contamination - Section 3.2-Hazardous Substance/Waste Management Information has been enhanced for added clarity regarding contamination sources.

3.5.2 Groundwater Migration Pathway - As suggested in the conclusion to the PEA, DTSC acknowledges that information regarding the regional groundwater contamination plume, groundwater flow, effect of the Verdugo Fault on groundwater flow and potential for this site to be contributing to the regional plume is required through additional investigation. The groundwater target information was revised to reflect changes in the HRS scoresheet, as needed.

3.6 Emergency Response Considerations - Revised to incorporate comment.

3.7 Summary - Revised to incorporate comment.